

Sage Communications, Inc.

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Sage Communications, Inc. ("Sage Communications") to mitigate and eliminate illegal robocalling. Sage Communications has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Sage Communications provides interconnected Voice over Internet Protocol ("VoIP") calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Sage Communications is dependent on our underlying provider's assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Sage Communications, Inc. has master service agreements with our upstream providers (Skyswitch and ClearlyIP) and has received written assurances from their officials that it has and will continue to sign calls submitted to Sage Communications, Inc. and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Sage Communications. Sage Communications and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. We have regular contact with our account teams.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. We have an entire onboarding process and call design session with every client. In many cases, we manage their IT infrastructure as well. Our sales and service process is all face-to-face. We don't have any sign-up process that is remote or anonymous.

In our research of the prospect, Sage Communications will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Sage Communications' strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Sage Communications.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Sage Communications as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Sage Communications is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Sage Communications will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Rick Minyard
Telecom Manager
805-914-1800

Upon calling our Traceback Contact, an initial ticket is opened with our carrier, and we would gather and provide whatever information is needed.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Sage Communications will either warn them to stop or terminate their service as appropriate.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Sage Communications and/or obtained by Sage Communications from Sage Communications' underlying carrier for use by the subscriber. Numbers can also be allocated by Sage Communications or ported using information from the previous bill matching customer information.

International Calling

Sage Communications is not currently an international voice services provider. If at any time Sage Communications does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Sage Communications must rely on our aforementioned underlying providers and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Sage Communications monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

Sage Communications Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Rick Minyard, Telecom Manager
816 Via Alondra
Camarillo, CA 93012
805-914-1800
rminyard@sagenetcom.com